

1 Joseph R. Manning, Jr. (SBN 223381)
2 Craig G. Cote (SBN 132885)
3 Michael J. Manning (SBN 286879)
4 Tristan P. Jankowski (SBN 290301)
5 ADAPracticeGroup@manninglawoffice.com
MANNING LAW, APC
4667 MacArthur Blvd., Suite 150
Newport Beach, CA 92660
Tel: 949.200.8755
Fax: 866.843.8308

Attorneys for Plaintiff
SUZANNE NAPIER

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA- SOUTHERN DIVISION

SUZANNE NAPIER, an individual ,
Plaintiff,
v.
BROWNIE LEE, an individual
dba, The Flame Broiler;
SHAPELL SOCAL RENTAL
PROPERTIES, LLC, a Delaware
limited liability company; and
DOES 1-10, inclusive,
Defendants,

Case No.: 8:17-cv-01127-AG-JCG

Hon. Andrew J. Guilford

**NOTICE OF VOLUNTARY
DISMISSAL WITH PREJUDICE
PURSUANT TO FEDERAL RULE OF
CIVIL PROCEDURE 41(a)(1)(A)(i)**

Complaint Filed: June 30, 2017
Trial Date: None

1

2 **TO THE COURT AND ALL PARTIES:**

3

4

5

6

Pursuant to Rule 41(a)(1)(A)(i) of the Federal Rules of Civil Procedure,
Plaintiff Suzanne Napier (“Plaintiff”) requests that this Court enter a dismissal with
prejudice of Plaintiff’s Complaint in the above-entitled action, in its entirety. Each
party shall bear his or its own costs and attorneys’ expenses.

7

8

9

Respectfully submitted,

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

DATED : October 23, 2017

MANNING LAW, APC

By: /s/ Joseph R. Manning, Jr.

Joseph R. Manning, Jr.
Attorney for Plaintiff
SUZANNE NAPIER

CERTIFICATE OF SERVICE

I certify that on October 23, 2017, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on counsel of record in this action via email transmission and via transmission of Electronic Filing generated by CM/ECF.

Respectfully submitted,

Dated: October 23, 2017

MANNING LAW, APC

By: /s/ Joseph R. Manning, Jr., Esq.
Joseph R. Manning, Jr., Esq.
Attorney for Plaintiff,
SUZANNE NAPIER